



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

August 6, 2007

Reply To  
Attn Of: ETPA-088

Ref: 02-012-AFS

Randall Shepard, District Ranger  
Naches Ranger District  
10237 U.S. Highway 12  
Naches, WA 98937

Dear Mr. Shepard:

The U.S. Environmental Protection Agency (EPA) has reviewed the final Environmental Impact Statement (EIS) and ROD for the **White Pass Expansion Project** (CEQ No. 20070279) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions and the document's adequacy in meeting NEPA requirements.

The final EIS and ROD identifies a modified Alternative 4 from the draft EIS as the Selected Alternative. The EIS states that this alternative was developed to address issues associated with riparian areas and other ski area design such as terrain distribution, terrain safety, off-piste skiing terrain. In our comments on the draft EIS, issues we raised included sediment and soil erosion, water resources, skier visitation, habitat connectivity, noxious weeds, and monitoring. We appreciate the response to comments and additional information regarding water resources (i.e. WEPP modeling, aquatic conservation strategy objectives, monitoring, updated 300-foot riparian areas for perennial fish bearing streams) as well as the inclusion of Biological Evaluations for fisheries, wildlife, and vegetation. The final EIS also included appropriate and very helpful tables and figures for resources analyzed. We continue to have concerns regarding impacts to riparian area and habitat connectivity related to threatened and endangered species. We have additional comments related to the Forest Plan amendment regarding development in the White Pass Inventoried Roadless Area. We also recommend that additional information regarding watersheds and the potential for skier visitation due to road destruction from past and potentially future severe storm events be used as the project proceeds.

The final EIS states that one factor in the development of Modified Alternative 4 was to respond to comments related to riparian areas. The Alternative 4 presented in the draft EIS was modified because it would have required an amendment of the Gifford Pinchot National Forest to allow for the crossing of riparian influence areas. We support the modification and avoidance of riparian crossings. However, Alternative 4 also appears to have the greatest impact to riparian areas (25.8 riparian reserve impacts and 5.9 riparian influence area impacts) among alternatives 2, 4 and 6, which are about half as much. We support implementing a design that has the least

amount of impacts to riparian areas as possible and implementing best management practices to ensure that streams are not being adversely impacted and essential riparian habitat is maintained.

The final EIS discusses threatened and endangered wildlife in the area such as Northern Spotted Owl, Canada lynx, and gray wolf. The EIS includes a section on habitat connectivity, which is important for wildlife and late-seral forest habitat is important for wide-ranging species. The EIS states that Modified Alternative 4 would result in the greatest impact to habitat connectivity because it removes the largest amount of trees. Table 3.3-8 lists the biological evaluation determination for Northern Spotted Owl as May Affect, Likely to Adversely Affect and Gray Wolf as May Affect, Not Likely to Adversely Affect. The final EIS included the BA for wildlife; however, the Biological Opinion was not included and therefore, it is unclear what the US Fish and Wildlife Service (USFWS) recommends for the project. We support implementing activities that have the least impacts to threatened and endangered species and recommend implementing any USFWS recommendations to reduce and mitigate impacts.

The final EIS discusses the Forest Plan amendment to allow for development within the White Pass Study area. We understand that 800 acres of the Inventoried Roadless Area was excluded from potential Wilderness designation to provide for potential ski area expansion. The ROD discusses the amendment to the Forest Plan to allow for expansion into this area in order to implement Modified Alternative 4. First, we support using adaptive management for Forest Plans; however, when major amendments are made we recommend informing the public and soliciting comments when necessary. Second, we support striving to maintain roadless areas and the potential for Wilderness.

The Final EIS identifies the Clear-Fork Cowlitz Watershed as a Tier 2 watershed. This means that it is an important source for high quality water for at-risk fish species. The draft EIS states that impacts to streams from sediment and increased temperature and associated dissolved oxygen are expected to be negligible in the long term due to implementation of BMPs and the EIS provides a table of mitigation measures. We support implementing BMPs and appreciate the inclusion of mitigation measures. However, we did not see a clear link to how the quality of the Tier 2 watershed would be maintained. We recommend that the portion of the Clear-Fork Watershed that is in the study area be considered in the larger context in order to support the necessary ecosystem functions of a Tier 2 watershed and clearly linking activities to the bigger picture.

The Final EIS states that there is an expected 1% increase in skier visitation under Modified Alternative 4. The response to our comment on the draft EIS stated that skier visitation data is obtained from the PNSAA data and records provided by White Pass Ski Area. It is unclear what the PNSAA is since it was not included in the list of acronyms and we are still unclear why the increase would occur when the draft EIS also stated that Oregon and Washington skier visits have been steady. We also understand that skier visitation can vary based on weather as stated in the EIS. We have questions regarding how severe storm events and road closures may impact visitation annually and the EIS did not appear to discuss these potential impacts on

visitation. We recommend considering these if they were not already factored into predicting an

increase on visitation.

Thank you for the opportunity to review this final EIS. If you would like to discuss these issues, please contact Lynne McWhorter at 206-553-0205.

Sincerely,

/s/

Christine Reichgott, Manager  
NEPA Review Unit